

1 SUE FAHAM
2 Acting United States Attorney
3 District of Nevada
4 Nevada Bar No. 5634

5 KARISSA D. NEFF
6 Assistant United States Attorney
7 Nevada Bar No. 9133
8 501 Las Vegas Blvd. So., Suite 1100
9 Las Vegas, Nevada 89101
10 Phone: (702) 388-6336
11 Karissa.Neff@usdoj.gov

12 *Attorneys for the United States*

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14 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

15 Brandon Kotaniemi, individually and as special
16 co-administrator of the Estate of Marsha
17 Kotaniemi; Steven Kotaniemi, individually and
18 as special co-administrator of the Estate of
19 Marsha Kotaniemi,
20 ,

21 Plaintiffs,

22 v.

23 Brian C. Ward, MD, an individual in his
24 official capacity; Stephanie Martinez, MD,
25 an individual in her official capacity; Emily
26 Tibbits, MD, an individual; Lisa Angotti,
27 MD an individual; State of Nevada ex rel
28 The Board of Regents of the Nevada System
of Higher Education ex rel the University of
Nevada, Las Vegas, a political subdivision;
DOE INDIVIDUALS I-X, inclusive; and
ROE CORPORATIONS I-X, inclusive,

Defendants.

Case No. 2:25-cv-00540-APG-MDC

**Stipulation and Order for Extension of
Time to Respond to Complaint**

(FIRST REQUEST)

Plaintiffs Brandon Kotaniemi and Steven Kotaniemi, through counsel and the
United States of America, on behalf of federal defendants, Emily Tibbits, MD and Lisa
Angotti, MD (“United States” and/or “Federal Defendant”), hereby stipulate and agree as
follows:

1. Plaintiffs filed their complaint in the Eighth Judicial District Court Clark County, Nevada on February 4, 2025.

2. Federal Defendant United States removed this case to the United States District Court, District of Nevada on March 24, 2025.

3. The current deadline for the United States to respond to Plaintiff's complaint is March 31, 2025.

4. Plaintiffs and the United States, through undersigned counsel, agree and stipulate that the United States' time to respond to Plaintiff's Complaint shall be extended through April 16, 2025.

5. The extension of time is necessary because counsel for the United States requires additional time to obtain and review the relevant information relating to the allegations in Plaintiffs' complaint.

Therefore, the parties request that the Court extend the deadline for the United States to respond to Plaintiffs' complaint through April 16, 2025.

This stipulated request is filed in good faith and not for the purpose of undue delay.

Respectfully submitted this 28th day of March 2025.

THE POWELL LAW FIRM

/s/ Tom W. Stewart
TOM W. STEWART
8918 Spanish Ridge Avenue, Suite 100
Las Vegas, Nevada 89148

Attorney for Plaintiffs

SUE FAHAMI
Acting United States Attorney

/s/ Karissa D. Neff
KARISSA D. NEFF
Assistant United States Attorney

Attorneys for Federal Defendants

IT IS SO ORDERED:

Hon. Maximiliano D. Couvillier III
United States Magistrate Judge
DATED: 4/1/2025